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P.O. BOX 517
GOLDFIELD, NEVADA 89013

STAFF

ADMINISTRATIVE
ASSISTANT
Kelly Eagan
PH (775) 485-3406
FAX (775) 485-6351
(800) 884-4072
esmboc@gmail.com

January 27, 2016

DELIVERED VIA ELECTRONIC MAIL

Attn: Colleen Sievers, Project Mgr.
BLM Carson City District Office
5665 Morgan Mill Rd.
Carson City, NV 89701

Email: blm_nv_ccdowebmail@blm.gov

RE: Esmeralda County Comments Notice Federal Register November 13, 2015 80FR70253
"Opportunity to Comment on Changes to the Nevada and California Greater Sage-Grouse Bi-
State Distinct Population Segment Carson City Office Consolidated Resource Management Plan
and the Tonopah Field Office Resource Management Plan Amendment, Nevada"

Dear Ms. Sievers:

I thank you for your reply to our inquiry for clarification on the proposed changes and the opportunity to meet with both yourself, representative from the Carson City BLM, and representatives from the Humboldt-Toiyabe Forest to discuss these proposals. We have reviewed the proposed changes and offer the following comments.

I. Habitat Disturbance-Proposed Change

The proposed change states "to set a total anthropogenic disturbance of no more than 3 percent of the total BSSG habitat on Federal lands within the White Mountain population management unit boundary".

1. We oppose this new proposal because there is inadequate interpretation and we believe it will create chaos, and not be applied on a uniform basis.

- We requested clarification and received as part of the reply:” *anthropogenic disturbance only applies to areas within 4.7 miles of an active or pending lek. Anthropogenic disturbance in PMUs, or BSSG habitat outside the 4.7 mile lek buffer is not considered in the 3% disturbance cap.*” Based on the information provided for the purpose of clarity adopted we request that the proposed change should be re-worded to: set a total anthropogenic disturbance of no more than 3 percent of the total BSSG habitat *areas within 4.7 miles of an active lek* on Federal lands managed by the BLM Carson City District Office, Battle Mountain District Office within the White Mountain (and other named PMUs) population management unit boundaries. The FEIS defines as habitat all lands shown on figure 2-1 page 17. This figure shows “connective” habitat and habitat that is not occupied. We are concerned that given our experiences local staff will misconstrue the current phrasing due to insufficient training and high turnover and thus cause confusion and tension with both local government and users of the public land. An alternative would be to define habitat as used in any final Record of Decision as being within 4.7 miles of an active lek.
 - Identification and definition of leks . We are concerned over the use of the term *pending lek* as it is not clear if these include *historic and or possible future lek locations* anticipated in the future after landscape remediation and relocation which are not occupied at present. Should the BLM and US Forest Service adopt this change data on lek locations should be accessible to local governments given our state legal responsibility to perform land planning and oversee development within our borders. Please also refer to our section on habitat.
 - Definition of Anthropogenic Disturbance The definitions of anthropogenic include a.) pertaining to the origin of man, b.) having its origin in the influence of human activity on nature c.) of anthropogenesis, and d.) caused by man, as air pollution. Given the wide range of activities and influences which could be included in these definitions we request a specific definition of what would constitute an anthropogenic disturbance under the proposed 3% cap. Even though the BLM has a definition of anthropogenic disturbance as human created features it was clear in our meeting on January 21, 2016 that there exists some difference even between federal land managers of what constitutes an anthropogenic disturbance. Leaving the determination of anthropogenic disturbance to the eye of the beholder will create inconsistent application and much friction with local government and public land users.
 - Not all Anthropogenic Disturbance has an equal effect on the Sage Grouse and using a cap removes discretion. The 4.7 mile buffer is an average distance based on the areas that have been studied. Most of these areas are closer to urbanized zones and from our interpretation of the data noise and the level of activity contribute as much or more to the choice of habitat and lek locations as surface disturbance. The grouse would likely not locate within 4.7 miles of a state highway but might locate within 1 mile or less of a travel road which experiences infrequent pleasure driving use or use during deer hunting season.
2. We oppose this new proposal because it creates unconformity in management. The White Mountain PMU area is managed by the BLM, the Inyo National Forest, and the Bishop BLM. The Inyo National Forest is in the process of updating their Land Use

Management Plan and is currently (and quite successfully) supporting the species through management guidance. The Bishop BLM manages the species by classifying it as "special". Neither the Inyo Forest management nor the Bishop BLM uses a disturbance cap. Therefore this proposal creates unconformity in management for the population and habitat in the White Mountain PMU. Assuming that the Inyo National Forest and Bishop BLM will adopt this proposal is a blatant disregard for the NEPA process and requirements.

3. We oppose this new proposal because it appears that its adoption occurred entirely as a result of the protest process and represents a complete reversal in the stance represented during the public process while the Final Plan Amendment and FEIS were being authored. The application of a cap was discussed during this process and not selected we offer the following response to comments submitted on the Revised DEIS from WildEarth Guardians prepared by Cristi Corey-Luse and James Winfrey March/April 2015 quoted below:

***“Comment:** We would ask the responsible official also to render the same determination regarding the accuracy, reliability, and relevance of science supporting the 3% disturbance cap proposed for implementation as a Condition of Approval for existing fluid mineral leases under Alternatives B and C.*

***Response:** While a 3 percent disturbance cap has been included in the proposed action since the draft EIS, there have always been questions regarding how it would be calculated and implemented. The revised draft introduces the “no net unmitigated loss” of habitat which is much easier to comprehend and does not provide for the incremental reduction of available habitat through the 3 percent process. It is the no net loss of habitat standard that is being included in the preferred alternative. The 3 percent cap would be based on existing anthropogenic disturbance in bi-state DPS habitat regardless of ownership. Existing roads, power line corridors, substations, fence lines, range facilities, recreation facilities and trails, disturbance related to mineral exploration and development, would all contribute to the determination of the existing condition. Once the existing condition was determined, any additional (proposed) disturbance would be added to that level until the 3 percent cap was met.*

***Comment:** Please also make a formal determination regarding the disturbance cap in the context of sagebrush canopy cover, and if 3% is not the scientifically defensible threshold, then where that threshold should be set, for the same reasons as noted above for the 3% and 5% disturbance caps.*

***Response:** See response above”*

4. Implementation and Administration The plan amendment involves several BLM District/Field Offices and the US Forest Service. We request clarification/determination on by whom and at which office(s) the administration of this 3% cap will occur for the White Mountain PMU and by whom and where calculations of additions and subtractions from the cap will occur.

II. Tall Structure Buffer-Proposed Change

1. Areas in and adjacent to the Fish Lake Valley, and Lida in Esmeralda County are totally without cell phone service and broadband therefore we request consideration of including an exemption to not authorizing tall structures within 4 miles of an active or pending lek if the structure is essential for public safety or public need.
2. The proposed change will increase the negative economic impact to our county as it will interfere with private landowner's ability to improve or develop land by outlawing construction of power lines, deter economic development by denying needed communication upgrade as previously noted, prevent installation of windmills for range water pumping activities, and although mining is supposed to be permitted with restrictions it is difficult to imagine that the associated processing could be accomplished without the presence of tall structures as defined. Economic analysis should be done to comply with NEPA.

III. High-Voltage Transmission Line Proposed Change- There are producing geothermal operations located in Fish Lake Valley and there is a need not only to export these resources but also a possible intertie the Valley Electric system and NV Energy to supply sufficient power to the area. No transmission line has been permitted for either of these purposes. Please also refer to section V White Mountain PMU Habitat and delineation.

IV. Connectivity Habitat- Proposed Change

1. Given the enlightenment received at the meeting on January 21, 2016 what is now referred to as "connective habitat" needs to be given another name because it is not habitat but represents possible travel corridors between habitat areas. Continuing use of the current term will create confusion in the application of any standard adopted and use of habitat will create confusion as to whether the other habitat standards apply to these areas also. These areas should also be shown separate from other habitat on any maps.
2. If a standard is adopted, adopting C-Min-S-01 for connective habitat management is preferred as C-Wild-S-02 in our opinion is not feasible due to the fact that much of the habitat fragmentation is due to the natural condition of the areas separating habitat and not favorable to sage-brush culture.

V. White Mountain PMU Habitat identification and delineation

The FEIS states the following with respect to which areas are considered habitat and where geographically this habitat is located.

"Alternatives B and C: Bi-state DPS Habitat

For this amendment, bi-state DPS habitat (habitat) refers to the "Bi-state DPS Habitat Map" (Figure 2-1) of all seasonal and year-round bi-state DPS habitat plus all land within 7 kilometers (about 4 miles) of active leks. The habitat map was created with modeling and aerial imagery, and is therefore subject to field-verification and updates as new information becomes available. For the

bi-state DPS, all habitat is considered high priority, so there is no delineation of "general" or "priority" habitat for this analysis. References to priority habitat in the revised draft EIS were in error and have been removed from the final EIS. Management direction proposed and then ultimately selected from this final EIS will apply to the entire designated habitat area.

While greater sage-grouse leks and core breeding habitat are fairly stable over time, they are not fixed geographic points and are subject to change. For example, the status of leks may fluctuate between inactive, pending, or active, and habitat areas may change over time (such as after wildland fire modifies habitat or the slow expansion of woodlands into habitat). Appropriate conservation measures will be considered and applied on a case-by-case basis through NEPA for proposed projects, based on ground surveys within proposed disturbance areas.

For the habitat map in this amendment proposal under both alternatives B and C, the Forest Service proposes to use the habitat map created and approved by the Bi-state Sage Grouse Technical Advisory Committee, consisting of representatives from California and Nevada BLM, U.S. Geological Survey, Forest Service, USFWS, and the California and Nevada state wildlife agencies. The May 12, 2012, version of this map is available on the Humboldt-Toiyabe National Forest and BLM websites. Updates may become available on an annual basis as monitoring and mapping continues. The proposed amendment would allow adjustments to the map as new science provides, subsequent to a NEPA sufficiency review. If the review indicates that effects are other than what are disclosed in this final EIS, the appropriate NEPA and planning processes will be followed before updating the map."

1. Validity of habitat data shown on Figure 2-1 "Bi-state DPS Habitat Map"

Throughout the EIS process our county has submitted comments on validity of the habitat as shown. Even though the FEIS states that it is subject to field verification we are extremely concerned that this will only occur on a project by project basis and the overall geographic identification of habitat subjected to the management decisions made based on the FEIS will not; due to the following statement *"Updates may become available on an annual basis as monitoring and mapping continues. The proposed amendment would allow adjustments to the map as new science provides, subsequent to a NEPA sufficiency review. If the review indicates that effects are other than what are disclosed in this final EIS, the appropriate NEPA and planning processes will be followed before updating the map."*

Our interpretation of this statement is that even if areas currently shown as habitat or connective habitat are found to be invalid in the future it would not invalidate the effects disclosed in the FEIS since there would still be habitat present. Hence the map will not be updated until some future resource management plan update is undertaken using updated habitat information.

The consequence of this should our interpretation be accurate is that undue economic and social damage will be incurred by our county and citizens and the BLM will expend both human and monetary resources applying Bi-state sage grouse habitat management standards.

The FEIS states "For the habitat map in this amendment proposal under both alternatives B and C, the Forest Service proposes to use the habitat map created and approved by the Bi-state Sage Grouse Technical Advisory Committee, consisting of representatives from California and Nevada BLM, U.S. Geological Survey, Forest Service, USFWS, and the California and Nevada state wildlife agencies. The May 12, 2012, version of this map is available on the Humboldt-Toiyabe National Forest and BLM websites."

From the information available to us, the habitat within Esmeralda County has been identified through aerial vegetation surveys and unverified verbal reports that are over 20 years old. Below is an extract from the "Bi-State Area Greater Sage-Grouse Conservation Plan, June 2004 page 108"

"6.3 Sage-grouse Populations

6.3.1 Historical Distribution

Esmeralda County—Very little historic sage-grouse data exist for Esmeralda County. Information that does exist consists of harvest data, limited brood survey data, and various verbal reports received over the years from locals and sportsmen. This information indicates that sage-grouse densities have always been relatively low in Esmeralda County, and that the majority of sage-grouse occur along the east side of the White Mountains in the western portion of the county. The fact that sage-grouse were not abundant in Esmeralda County made the area a low priority for survey efforts in the past, which in turn has resulted in a lack of general knowledge about this population.

Anecdotal evidence, in the form of verbal sighting reports from sportsmen, locals, and others, suggests that sage-grouse historically occurred in low densities in the Magruder Mountain/Upper Tule Canyon area of southern Esmeralda County, Nevada. The latest, unverified report of a sage-grouse sighting in this area occurred in 1998. Anecdotal evidence also suggests that sage-grouse historically occurred in the Silver Peak Range although no sightings have been reported in many years.

Information gathered from 10 percent hunter harvest questionnaire data between 1960 and 1998 shows that the average annual sage-grouse harvest in Esmeralda County was 5.5 birds by an average of 5 hunters during 36 open seasons. Sage-grouse hunting in Esmeralda County was discontinued beginning in 1999."

NEPA requires that the best available science be used. True scientific data on the White Mountain PMU that we are aware of agrees with our many comments that sage grouse and their habitat in our county is adjacent to the White Mountains. We respectfully submit the following:

A 2013 power point titled "Nevada Sage-grouse Population Distribution" shows that 100% of core breeding density within the White Mountain PMU occurred on the extreme western border of Esmeralda County in the White Mountains. The report titled "U.S Fish and Wildlife Service Species Status Assessment Bi-State Distinct Population Segment of Greater Sage-Grouse" pages 29-31 discussion on the White Mountains PMU states the following:

"6. White Mountains PMU

The White Mountains PMU is the southernmost PMU in the Bi-State DPS, encompassing the White Mountains along the border of Nevada and California. It extends from the Candelaria Hills and Truman Meadows areas in the north to California Highway 168 in the south and from California Highway 6 in the west to the Silver Peak Range, Nevada, in the east. Historical and current distributions of sage-grouse in the White Mountains are not well understood. The area is difficult to access and, due to elevation, heavy snow conditions are typical during the spring breeding season. In addition, the number, size, and activity of leks in the White Mountains are poorly known due to infrequent and opportunistic surveys. Historical accounts in Esmeralda County, Nevada, suggest bird densities there have likely always been low. Anecdotal evidence suggests birds historically occurred in the Silver Peak Range and in the hills surrounding Magruder Mountain, Nevada (Bi-State Local Planning Group 2004, p. 108). Both of these ranges have limited sagebrush habitat and are separated from the White Mountains to the west by several miles of unsuitable habitat. The last, unverified, reported sighting in these mountain ranges occurred in 1998 (Bi-State Local Planning Group 2004, p. 108). The Volcanic Hills area in northern Esmeralda County also has limited sagebrush habitat and is disjunct from the White Mountains proper. A past survey of the Volcanic Hills documented a single individual but

additional anecdotal information suggests occasional use (Bi-State Lek Surveillance Program 2012, p. 38). While bird sign (e.g., droppings) has been reported in this area, data are too limited to discern if there have been changes in use of this area by sage-grouse. The major extent of sage-grouse distribution in the Nevada portion of the White Mountains PMU occurs along the eastern benches of the White Mountains in the western portion of Esmeralda County. This encompasses an area from approximately Chiatovich Creek, north to the Esmeralda and Mineral County line, with the majority of sage-grouse use centered on Trail Canyon. Historical use was apparently limited (Bi-State Local Planning Group 2004, p. 108). Current use of this area may have been negatively influenced by recent housing developments in the Chiatovich Creek area (Bi-State Lek Surveillance Program 2012, p. 38). No birds were detected in the area during a 2012 survey. Historical occurrence has also been documented northwest of Trail Canyon centered on Sagehen Flat and to the north of Nevada Highway 6 surrounding Truman Meadows and McBride Flat. A 2012 aerial survey did not detect birds in these areas and surveyors observed that the current habitat did not appear suitable to sage-grouse (Bi-State Lek Surveillance Program 2012, p. 36). These areas likely afforded the greatest connectivity with the Adobe Valley area within the South Mono PMU, but this connectivity appears to be currently compromised. Historical sage-grouse distribution within the California portion of the White Mountains PMU is poorly understood. Habitat loss along lower elevation sites due primarily to woodland succession is apparent but has not been quantified (Bi-State TAC 2012, p. 40). The majority of historical and current use occurs in the central to southern portion of the White Mountains from approximately Tres Plumas Flat south to Black Mountain. While not contained within the delineated White Mountain PMU polygon, there is historical documentation of sage-grouse in the Coyote Flat area to the southwest of Bishop, California, and other locations along the eastern foothills of the Sierra Nevada mountains as far south as Independence, California (USFS 1966, p. 4). However, these locations are no longer occupied and were not included in the PMU designations (Hall 2008, p. 97).

At the time of the proposed listing rule, the estimated sage-grouse population size for the White Mountains PMU was unknown, and the best available information indicated there may be a minimum of two active leks in Nevada and two leks in California (Table 1). There have been 3 years of recent helicopter lek inventory surveys conducted within the White Mountains PMU. Helicopter surveys in March 2006 documented 206 sage-grouse (males and females; Bi-State TAC 2012, p. 40). Birds were observed at high elevation (approximately 2,900 m (9,514 ft)) in the general vicinity of Bucks Peak, Red Peak, and Iron Mountain, and north toward Tres Plumas Flat and Chiatovich Flat. During helicopter surveys in April 2008, CDFW (Bi-State TAC 2012, p. 40) documented a total 33 sage-grouse (male and female) in the vicinity of the Mono and Inyo County line, centered near Sagehen Flat and Blanco Mountain. These flights were conducted relatively early in the breeding season, thus no active strutting activity was observed and no lek sites were recorded.

During April 4–7, 2012, three helicopter surveys were conducted in the White Mountains:

- (1) A survey of Queen Valley and north toward Truman Meadows and McBride Flat did not produce any sightings, and this area was generally described as currently lacking suitable habitat (Bi-State Lek Surveillance Program 2012, p. 36). Historical bird occurrence in these areas has been reported, but confirmation of regular use is not available (Bi-State Local Planning Group 2004, p. 109). Eight individuals were observed north of Pinchot Creek near the Esmeralda and Mineral County line.
- (2) A survey of the east side of the White Mountains was conducted between Perry Aiken Creek and extended north toward the Mineral and Esmeralda County line, Nevada, and the southern extent of Queen Valley. No sage-grouse were detected and little suitable habitat was noted. In the lower Trail Canyon area a total of 18 birds were documented. Twelve individuals were associated with a single location (one presumed

lek), including five strutting males, three hens, and four unknowns; the remaining six individuals were a mix of hens and cocks, and these single bird sightings occurred within less than 1.6 km (1 mi) of the strutting activity. A survey of the north end of the White Mountains (in the vicinity of Mustang Point and Kennedy Flats before moving east to the Volcanic Hills) indicated that suitable habitat in both of these locations appeared limited and no birds were detected. Eight individuals were detected north of Pinchot Creek near the Esmeralda and Mineral County line. No strutting activity was documented but the occurrence of both males and females in the same area suggest the presence of a breeding ground.

(3) A survey of the middle to southern half of the White Mountains and Coyote Flats located to the southwest of Bishop, California, detected no birds in the Coyote Flats area and no birds between the Tres Plumas Flat area in the White Mountains, north to Chiatovich Flat area. In the south-central portion of the White Mountains a total of 64 individuals were recorded. The survey area encompassed much of the landscape where previous sightings occurred, generally centered on Tres Plumas Flat and south to Iron Mountain and the upper Wyman Creek areas. Group size ranged from 1 to 12 individuals, and while no strutting activity was documented, several locations were possible lek sites.

In 2013 and 2014, the two active lek sites located in Nevada had a combined total of five males during each survey year; California did not survey these years."

In addition population information contained in the March 15, 2012 "Bi-State Sage-Grouse DPS Action Plan" and comments submitted to the US Fish and Wildlife Service by the Inyo National Forest are consistent with the above cited sources as to the distribution of Bi-state sage grouse.

In 1998 it is conceivable there was connectivity between the White Mountain population and the western slope of the Silver Peak Mountains in Fish Lake Valley and to areas south of Oasis adjacent to the Sylvania Mountains which can be accessed by offshoots of the road to Pigeon Springs. The Fish Lake Valley landscape has dramatically changed due to two primary factors, first a declining water table with an associated loss/and or change of vegetation in the Fish Lake Valley (documented in a vegetation report by the BLM) and overpopulation of feral horses for many years. Any connectivity which may still exist would likely occur parallel to California SR 266 at the southernmost part of the Fish Lake Valley with the birds using farmland as a corridor.

From our standpoint the best available science is based on confirmed physical presence as detailed in the reports and references we have cited and not on if an aerial survey which shows sufficient vegetation is present or unverified observations over 20 yrs old given by persons that may not have really known exactly where they were.

There is more recent and refined data on the locations of the species as witnessed by reference to unpublished 2015 BLM data, data that was contained in the US Fish and Wildlife final report, and updated information from NDOW and the Local Area Working Group.

It is our request that consideration be given to refine the amendment boundary, habitat delineation, and include this in the Final Record of Decision or define habitat for the purposes of the Resource Management Plan amendment as within 4.7 miles of an active lek.

VI. Public Participation

At all opportunities we have commented on the inadequacy of the public participation process in the preparation of this EIS and it is our opinion that this process did not meet the requirements of NEPA or BLM land planning policies and regulations. These new proposals represent a substantial change to the preferred alternative selected and described in the FEIS and if they had been stated as selected in the FEIS entities and persons opposed to their adoption would have registered protests. In our opinion these changes were either adopted because of pressure during the protest period, because the Nevada BLM wanted consistency between handling of the Bi-state sage grouse and Greater sage grouse in land plans, or because there was an intention from the start to adopt these standards. We mention the last due to the presence of similar proposals in draft chapters of the never completed Battle Mountain Resource Management Plan Update.

The public participation process described in the document notes that meetings took place in only two communities, one in Douglas County, one in Lyon County both in Humboldt-Toiyabe Forest Service managed areas. The notices for these meetings were published in a newspaper that is not in circulation in Esmeralda County. The scoping notice that appeared on the EIS website both the original and corrected did not list Esmeralda County in the title so if we were sent a letter given the fact that we deal with the Inyo National Forest because there is no land managed by the Humboldt-Toiyabe in our county and our name did not appear in the title no more attention would have been given to the correspondence. The title page appears as the final one after the letter to back up our comment.

We have been a cooperating agency from the start of the ongoing Revision to the Battle Mountain Resource Management Plan and as such should have been included as a cooperating agency in the preparation of this EIS. We were not and would also point out that not one county in the State of Nevada was listed as a cooperating agency. During meetings on the Battle Mountain Resource Management Plan Revision the fact that this EIS would supersede the revision process was never communicated and the personnel involved in the revision never even seemed aware of the Bi-state sage grouse EIS. On this topic it is worthy to note that our county was addressed as being a cooperating agency when the Greater Sage Grouse EIS was being prepared by the BLM where the proposed amendments did not include any land within our county.

- VII. Lack of Sufficient Analysis of Economic Impact Throughout this process we have commented repeatedly that economic impacts have not been analyzed sufficiently or fully. With these new proposals there will be further impacts to our citizens and county. Some additional impacts may surface upon further definition and clarification of these proposals one that immediately comes to mind is how the 3% cap could affect our county road system given the difference in definition in what is considered a road by state law and BLM or the effect should certain areas exceed the cap, or, the ability of public land users to drive cross country to cut wood, retrieve game, prospect, stake mining claims, or conduct activities necessary to grazing.

Esmeralda County strongly supports conservation and management measures that support this species and habitat where these truly exist. Our county is one the most pristine in Nevada and preservation of this species, all wildlife, and our environment is a high priority to our government and our citizens. We also believe that the best way to achieve this is with the input, consent and knowledge of those who know this environment best, those that live, and work there. We are very concerned that these proposals will only deter actual conservation efforts in that they end run the cooperative efforts to date, will bog down agency resources in administration, create confusion and inconsistency in their application rather than benefit the bird. With this in mind we respectfully request that the Bureau of Land Management revise the habitat identified in the EIS to reflect more recent scientific data, and adopt our other suggestions regarding better definitions, terminology, and exceptions prior to issuing a Record of Decision amending the Tonopah Field Office Resource Management Plan. We will cooperate and provide anything we can to support in that effort. If this is done it would let the BLM focus resources on the areas which will truly benefit the sage grouse and lessen negative effects to our economy, citizens and the users of the public lands.

Yours truly,



Nancy Boland, Chair B.O.C.C.



United States
Department of
Agriculture
Forest Service

Intermountain
Region

Humboldt-Toiyabe
National Forest

December 2012



Scoping Notice

Greater Sage-Grouse Bi-State Distinct Population Segment Forest Plan Amendment Environmental Impact Statement (EIS)

Humboldt-Toiyabe National Forest

**Alpine and Mono Counties, California
Douglas, Lyon, and Mineral Counties, Nevada**



Bi-State Sage-Grouse

(Photo Courtesy of U.S. Fish and Wildlife Service)